

STATE OF CALIFORNIA

DECLARATION OF CHARLIE ANDERSON

COUNTY OF SAN BERNARDINO

1. My name is Charlie Anderson, and I understand and have been advised that Swift Transportation Co. of Arizona, LLC is a defendant in a proposed class action lawsuit pending in the United States District Court for the District of Arizona, that the lawsuit involves alleged violations of the Fair Credit Reporting Act, and that this declaration may be used in that lawsuit. I have personal knowledge of the following facts in this declaration.
2. I have provided this declaration voluntarily and not under coercion or duress. I have not received any benefits for providing this declaration, and I have not been threatened with any adverse employment action. I have had an opportunity to review and correct any provisions of this declaration.
3. I work for Swift Transportation of Arizona, LLC ("Swift") as a Driver. I have worked for Swift since January 2010. My home address is [REDACTED] and I work out of the Atlanta terminal.
4. I applied to work for Swift on or about January 2010, and I applied to be a Driver. I did not apply for any other position with Swift. I applied for employment with Swift via telephone.
5. At the time I applied for employment at Swift, I had my commercial drivers license, but I did not have any driving experience.
6. Since August 2006, I have applied to work for Swift on 1 occasion, which I did by telephone.
7. I have been a commercial truck driver since August 2009 when I first obtained my commercial driver's license. Since at least then, I have known that the U.S. Department of Transportation requires trucking companies to gather background information on applicants for hiring including a confirmation that its commercial driver's license is current and the employee's history with other trucking companies. I also have known that trucking companies run criminal background searches on applicants.
8. I understood when I applied for employment with Swift that Swift would use another company to obtain my criminal background report, my employment history with other trucking companies, my motor vehicle reports, and to confirm my commercial driver's license was valid. This is common knowledge among those applying to be drivers in the commercial truck driving industry.

9. I spoke with a Swift recruiter, and I spoke with a recruiter before my application was submitted to Swift. The Swift recruiter with whom I worked was named Ms. Brown. Our communications were conducted in on the phone.
10. The Swift recruiter told me the eligibility requirements for becoming a Swift employee. I was told that, to be eligible for employment with Swift, I needed to have a commercial drivers license, pass a background check and a drug test, and have medical clearance.
11. The Swift recruiter reviewed my application materials to ensure that they were complete.
12. The Swift recruiter told me me that Swift would be obtaining my motor vehicle reports and DAC reports (prior driving history) from another company. I did not object to Swift obtaining my motor vehicle reports and DAC reports.
13. The Swift recruiter told me that Swift would be obtaining my criminal background reports from another company. I did not object to Swift obtaining that information from another company.
14. I did not work with any other recruiters at Swift.
15. I have not been convicted of crimes.
16. Since I applied to work for Swift, I have not received a copy of my criminal background report.
17. Before beginning work at Swift, I took a drug test as part of Swift's hiring process. If applicable, I passed the drug test.
18. Before beginning work at Swift, I took a road test as part of Swift's hiring process. If applicable, I passed the road test.
19. Before beginning work at Swift, I attended an orientation for Swift in Greer, South Carolina. While I was at the orientation, I was reminded to disclose fully any convictions and to accurately answer all application questions and I reviewed a video about the importance of accurately disclosing my background at the orientation.
20. I reviewed and signed my employment application at orientation after confirming again that it was accurate.
21. Other than Swift recruiters and investigators, I did not speak with another Swift employee during the application process.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
August 9, 2012.

Signature: Charlie Anderson
Print Name: Charlie Anderson Jr

STATE OF COLORADO

DECLARATION OF JESSE L. BARGER

COUNTY OF DENVER

1. My name is Jesse Barger, and I understand and have been advised that Swift Transportation Co. of Arizona, LLC is a defendant in a proposed class action lawsuit pending in the United States District Court for the District of Arizona, that the lawsuit involves alleged violations of the Fair Credit Reporting Act, and that this declaration may be used in that lawsuit. I have personal knowledge of the following facts in this declaration.
2. I have provided this declaration voluntarily and not under coercion or duress. I have not received any benefits for providing this declaration, and I have not been threatened with any adverse employment action. I have had an opportunity to review and correct any provisions of this declaration.
3. I work for Swift Transportation of Arizona, LLC ("Swift") as a company driver. I have worked for Swift since February 3, 2012. My home address is [REDACTED] and I work out of the Phoenix, AZ terminal.
4. I applied to work for Swift on or about January 2012: I applied to be a driver; I did not apply for any other position with Swift. I applied for employment with Swift via the internet.
5. At the time, I applied for employment at Swift, I was an experienced driver, but because of the time lapse between this job and my last driving job I applied as a trainee.
6. Since August 2006, I have applied to work for Swift on one occasion. Each time I applied I did so via the internet.
7. I have been a commercial truck driver since 1986 when I first obtained my commercial driver's license. Since at least then, I have known that the U.S. Department of Transportation requires trucking companies to gather background information on applicants for hiring including a confirmation that its commercial driver's license is current and the employee's history with other trucking companies. I also have known that trucking companies run criminal background searches on applicants.
8. I understood when I applied for employment with Swift that Swift would use another company to obtain my criminal background report, my employment history with other trucking companies, my motor vehicle reports, and to confirm my commercial driver's license was valid. I am unaware of whether this is common knowledge among those applying to be drivers in the commercial truck driving industry.

9. I spoke with a Swift recruiter. If applicable, I spoke with a recruiter after my application was submitted to Swift. If applicable, the Swift recruiter with whom I worked was named Cindy Bouch. Our communications were conducted via telephone *and email*.
10. The Swift recruiter sent me information about the eligibility requirements for becoming a Swift employee, which I had already fulfilled through my school. I do not recall what I was told about the eligibility requirements.
11. The Swift recruiter reviewed my application materials to ensure that they were complete.
12. I do not recall if the Swift recruiter told me that Swift would be obtaining my motor vehicle reports and DAC reports (prior driving history) from another company.
13. The Swift recruiter did not tell me that Swift would be obtaining my criminal background reports from another company, but in my case I did not give the recruiter a reason to use a third party. I obtained information from Las Vegas Metropolitan Police Department and provided it directly to Swift. I do not know if they obtained more information from another source.
14. I did not work with any other recruiters at Swift.
15. I have been convicted of any crimes. I also completed a written Conviction Form at the request of Swift.
16. Since I applied to work for Swift, I have received a copy of my criminal background report. If applicable, I received my criminal background from the Las Vegas Metropolitan Police Department; it was correct.
17. Before beginning work at Swift, I did take a drug test as part of Swift's hiring process. If applicable, I passed the drug test.
18. Before beginning work at Swift, I took a road test as part of Swift's hiring process. If applicable, I passed the road test.
19. Before beginning work at Swift, I attended an orientation for Swift in Phoenix, AZ. If applicable, while I was at the orientation, I was reminded to disclose fully any convictions and to accurately answer all application questions, and I do not recall if I reviewed a video about the importance of accurately disclosing my background at the orientation.
20. I did review and sign my employment application at orientation after confirming again that it was accurate.
21. Other than Swift recruiters and investigators, I did speak with another Swift employee during the application process. If applicable, I spoke with Jack, who lead the orientation,

Toni Trent, who is in charge of driver development and making sure all of the paper work is complete.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 6, 2012.

Signature: Jesse Baran
Print Name: JESE BARAN

Applied - Not Hired

STATE OF NEVADA

COUNTY OF CLARK

DECLARATION OF Shawn Donley

1. My name is Shawn Donley, and I understand and have been advised that Swift Transportation Co. of Arizona, LLC is a defendant in a proposed class action lawsuit pending in the United States District Court for the District of Arizona, that the lawsuit involves alleged violations of the Fair Credit Reporting Act, and that this declaration may be used in that lawsuit. I have personal knowledge of the following facts in this declaration.
2. I have provided this declaration voluntarily and not under coercion or duress. I have not received any benefits for providing this declaration, and I have not been threatened with any adverse employment action. I have had an opportunity to review and correct any provisions of this declaration.
3. I applied to work for Swift on or about July/Aug 2010 I applied to be a/an truck driver; I did not apply for any other position with Swift. I applied for employment with Swift via (check the applicable box):

- ☒ Internet
☐ U.S. mail
☐ E-mail
☐ Telephone or facsimile
☐ In person at Swift's _____ location
☐ Do not remember.

4. At the time, I applied for employment at Swift, I was (check applicable box):

- ☒ An academy driver; I did not have a CDL and needed to attend a Swift driving school;
☐ A trainee driver;
☐ An experienced driver;
☐ A rehired driver; I had previously worked for Swift.

If I was a Swift academy applicant, I passed / didn't take (did not pass (circle one)) the mandatory on-line test. If I was a Swift academy applicant, I graduated / (did not graduate (circle one)) from the Swift academy.

5. Since August 2006, I have applied to work for Swift on 1 occasions. Each time I applied I did so via internet.

Applied - Not Hired

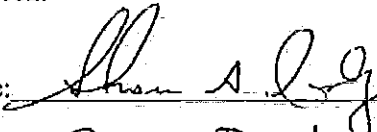
6. I have been a commercial truck driver since N/A ^{trainee driver but haven't driven yet} when I first obtained my commercial driver's license. Since at least then, I have known / not known (circle one) that the U.S. Department of Transportation requires trucking companies to gather background information on applicants for hiring including a confirmation that its commercial driver's license is current and the employee's history with other trucking companies. I also have known / not known (circle one) that trucking companies run criminal background searches on applicants.
7. I understood / did not understand (circle one) when I applied for employment with Swift that Swift would use another company to obtain my criminal background report, my employment history with other trucking companies, my motor vehicle reports, and to confirm my commercial driver's license was valid. This is is / is not (circle one) common knowledge among those applying to be drivers in the commercial truck driving industry.
8. I spoke / did not speak (circle one) with a Swift recruiter. If applicable, I spoke with a recruiter before / after (circle one) my application was submitted to Swift. If applicable, the Swift recruiter with whom I worked was named don't recall, female, CA. Our communications were conducted via (check all that are applicable):
- ☒ Telephone
☐ E-mail
☐ In-person. If in-person, I worked with the recruiter at the _____ location.
9. The Swift recruiter told me / did not tell me (circle one) the eligibility requirements for becoming a Swift employee. If applicable, I was told that, to be eligible for employment with Swift, I needed _____.
10. The Swift recruiter reviewed / did not review (circle one) my application materials to ensure that they were complete.
11. The Swift recruiter told me / did not tell me (circle one) that Swift would be obtaining my motor vehicle reports and DAC reports (prior driving history) from another company. I objected / did not object (circle one) to Swift obtaining that information from another company.
12. The Swift recruiter told me / did not tell me (circle one) that Swift would be obtaining my criminal background reports from another company. I objected / did not object (circle one) to Swift obtaining that information from another company.
13. I did / did not (circle one) work with any other recruiters at Swift. If applicable, I spoke with _____ recruiter(s). I communicated with them via _____. That recruiter told me _____.

Applied - Not Hired

- over 10 years ago
14. I have ~~have not (circle one)~~ been convicted of any crimes. If applicable, I also completed did not complete (circle one) a written Conviction Form at the request of Swift.
15. Since I applied to work for Swift, I have have not (circle one) received a copy of my criminal background report. If applicable, I received my criminal background from _____; it was correct / incorrect (circle one); I challenged / did not challenge (circle one) the accuracy of the report by contacting _____; and I acted / did not act (circle one) to correct the report by contacting _____.
16. During the application process with Swift, I also spoke with an employee in Swift's Security or Investigations department. I spoke with _____. The Swift investigator asked me about _____. I told the investigator about _____. That conversation occurred over the phone / in-person (circle one). I spoke with a Swift investigator on _____ occasions. In those conversations, the investigator told me _____.
17. If I discussed my criminal background with a Swift investigator, I challenged or questioned / did not challenge or question (circle one) in my report. If I challenged or questioned the report, the Swift investigator told me _____.
18. I did not receive an offer of employment from Swift. I believe the reason I did not get an offer was felony convictions. A Swift employee did ~~did not (circle one)~~ tell me the reason I did not get an offer.
19. During the application process with Swift, I took did not take (circle one) a road test as part of Swift's hiring process. If applicable, I passed / did not pass (circle one) the road test.
20. Other than Swift recruiters and investigators, I did / did not (circle one) speak with another Swift employee during the application process. If applicable, I spoke with _____ via _____.
21. My home address is _____
22. _____

Applied - Not Hired

I declare under penalty of perjury that the foregoing is true and correct. Executed on
August 8, 2012.

Signature: 
Print Name: Shawn Donley

STATE OF Colorado

COUNTY OF Denver

DECLARATION OF Jason Judkins

1. My name is Jason Judkins, and I understand and have been advised that Swift Transportation Co. of Arizona, LLC is a defendant in a proposed class action lawsuit pending in the United States District Court for the District of Arizona, that the lawsuit involves alleged violations of the Fair Credit Reporting Act, and that this declaration may be used in that lawsuit. I have personal knowledge of the following facts in this declaration.
2. I have provided this declaration voluntarily and not under coercion or duress. I have not received any benefits for providing this declaration, and I have not been threatened with any adverse employment action. I have had an opportunity to review and correct any provisions of this declaration.
3. I work for Swift Transportation of Arizona, LLC ("Swift") as a/an Commercial Driver. I have worked for Swift since March 2011. My home address is [REDACTED], and I work out of the CRIMM terminal.
4. I applied to work for Swift on or about March 2011; I applied to be a/an driver; I did not apply for any other position with Swift. I applied for employment with Swift via (check the applicable box):
 - ☒ Internet
 - ☐ U.S. mail
 - ☐ E-mail
 - ☐ Telephone or facsimile
 - ☐ In person at Swift's _____ location
 - ☐ Do not remember.

5. At the time, I applied for employment at Swift, I was (check applicable box):

- ☐ An academy driver; I did not have a CDL and needed to attend a Swift driving school;
- ☒ A trainee driver;
- ☐ An experienced driver;
- ☐ A rehire driver; I had previously worked for Swift.

If I was a Swift academy applicant, I passed / did not pass (circle one) the mandatory on-line test. If I was a Swift academy applicant, I graduated / did not graduate (circle one) from the Swift academy. N/A

6. Since August 2006, I have applied to work for Swift on 1 occasions. Each time I applied I did so via Internet.
7. I have been a commercial truck driver since March 2011 when I first obtained my commercial driver's license. Since at least then, I have known / not known (circle one) that the U.S. Department of Transportation requires trucking companies to gather background information on applicants for hiring including a confirmation that its commercial driver's license is current and the employee's history with other trucking companies. I also have known / not known (circle one) that trucking companies run criminal background searches on applicants.
8. I understood / did not understand (circle one) when I applied for employment with Swift that Swift would use another company to obtain my criminal background report, my employment history with other trucking companies, my motor vehicle reports, and to confirm my commercial driver's license was valid. This is / is not (circle one) common knowledge among those applying to be drivers in the commercial truck driving industry.
9. I spoke / did not speak (circle one) with a Swift recruiter. If applicable, I spoke with a recruiter before / after (circle one) my application was submitted to Swift. If applicable, the Swift recruiter with whom I worked was named Kevin Parks. Our communications were conducted via (check all that are applicable):
- ☒ Telephone
 - ☐ E-mail
 - ☐ In-person. If in-person, I worked with the recruiter at the _____ location.
10. The Swift recruiter told me / did not tell me (circle one) the eligibility requirements for becoming a Swift employee. If applicable, I was told that, to be eligible for employment with Swift, I needed employment history, valid CDL, up-to-date physical, criminal background check.
11. The Swift recruiter reviewed / did not review (circle one) my application materials to ensure that they were complete.
12. The Swift recruiter told me / did not tell me (circle one) that Swift would be obtaining my motor vehicle reports and DAC reports (prior driving history) from another company. I objected / did not object (circle one) to Swift obtaining that information from another company.
13. The Swift recruiter told me / did not tell me (circle one) that Swift would be obtaining my criminal background reports from another company. I objected / did not object (circle one) to Swift obtaining that information from another company.

14. I did / did not (circle one) work with any other recruiters at Swift. If applicable, I spoke with _____ recruiter(s). I communicated with them via _____. That recruiter told me _____.
15. I have / have not (circle one) been convicted of any crimes. If applicable, I also completed / did not complete (circle one) a written Conviction Form at the request of Swift.
16. Since I applied to work for Swift, I ^{not sure} have / have not (circle one) received a copy of my criminal background report. If applicable, I received my criminal background from _____; it was correct / incorrect (circle one); I challenged / did not challenge (circle one) the accuracy of the report by contacting _____; and I acted / did not act (circle one) to correct the report by contacting _____.
17. Before beginning work at Swift, I also spoke with an employee in Swift's Security or Investigations department. I spoke with _____. The Swift investigator asked me about _____. I told the investigator about _____. That conversation occurred over the phone / in-person (circle one). I spoke with a Swift investigator on _____ occasions. In those conversations, the investigator told me _____.
18. If I discussed my criminal background with a Swift investigator, I challenged or questioned / did not challenge or question (circle one) in my report. If I challenged or questioned the report, the Swift investigator told me _____.
19. Before beginning work at Swift, I did / did not (circle one) take a drug test as part of Swift's hiring process. If applicable, I passed / did not pass (circle one) the drug test.
20. Before beginning work at Swift, I took / did not take (circle one) a road test as part of Swift's hiring process. If applicable, I passed / did not pass (circle one) the road test.
21. Before beginning work at Swift, I attended / did not attend (circle one) an orientation for Swift in Denver. If applicable, while I was at the orientation, I was reminded / not reminded (circle one) to disclose fully any convictions and to accurately answer all application questions, and I reviewed / did not review (circle one) a video about the importance of accurately disclosing my background at the orientation.
22. I did / did not (circle one) review and sign my employment application at orientation after confirming again that it was accurate.

23. Other than Swift recruiters and investigators, I ~~did~~ did not (circle one) speak with another Swift employee during the application process. If applicable, I spoke with _____ via _____.
24. If it is determined that I am a member of the proposed class of plaintiffs in this case, I would want to recover: Nothing
25. _____

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 3, 2012.

Signature: _____

Print Name: Jason M Sudkins

STATE OF UTAH

DECLARATION OF DENNIS R. CARLISLE, JR.

COUNTY OF SALT LAKE

1. My name is Dennis R. Carlisle, Jr., and I understand and have been advised that Swift Transportation Co. of Arizona, LLC is a defendant in a proposed class action lawsuit pending in the United States District Court for the District of Arizona, that the lawsuit involves alleged violations of the Fair Credit Reporting Act, and that this declaration may be used in that lawsuit. I have personal knowledge of the following facts in this declaration.
2. I have provided this declaration voluntarily and not under coercion or duress. I have not received any benefits for providing this declaration, and I have not been threatened with any adverse employment action. I have had an opportunity to review and correct any provisions of this declaration.
3. I work for Swift Transportation of Arizona, LLC ("Swift") as a Hostler/Truck Driver. I have worked for Swift since February 7, 2007. My home address is [REDACTED] and I work out of the Salt Lake/Costco terminal.
4. I applied to work for Swift in or about January 2007. I applied to be a Truck Driver; I did not apply for any other position with Swift. I applied for employment with Swift via recruiter.
5. At the time, I applied for employment at Swift, I was a Truck Driver with Warner Enterprises.
6. Since August 2006, I have applied to work for Swift only on that occasion.
7. I have been a commercial truck driver since in or about September 2005 when I first obtained my commercial driver's license. Since at least then, I have known that the U.S. Department of Transportation requires trucking companies to gather background information on applicants for hiring including a confirmation that its commercial driver's license is current and the employee's history with other trucking companies. I also have known that trucking companies run criminal background searches on applicants.
8. I understood when I applied for employment with Swift that Swift would use another company to obtain my criminal background report, my employment history with other trucking companies, my motor vehicle reports, and to confirm my commercial driver's license was valid. I do not believe this is common knowledge among those applying to be drivers in the commercial truck driving industry.
9. I spoke with a Swift recruiter, whose name I cannot recall. Our communications were conducted via telephone.

10. Because of the time that has elapsed I do not recall whether the Swift recruiter spoke to me concerning the eligibility requirements for becoming a Swift employee.
11. The Swift recruiter reviewed my application materials to ensure that they were complete.
12. I do not recall whether the Swift recruiter told me that Swift would be obtaining my motor vehicle reports and DAC reports (prior driving history) from another company.
13. I do not recall whether the Swift recruiter told me that Swift would be obtaining my criminal background reports from another company.
14. I did not work with any other recruiters at Swift.
15. I have not been convicted of any crimes.
16. Since I applied to work for Swift, I cannot recall receiving a copy of my criminal background report.
17. Before beginning work at Swift, I took and passed a drug test as part of Swift's hiring process.
18. Before beginning work at Swift, I took and passed a road test as part of Swift's hiring process.
19. Before beginning work at Swift, I attended an orientation for Swift in or about February 2007. While I was at the orientation, I was reminded to disclose fully any convictions and to accurately answer all application questions. I do not recall whether I reviewed a video about the importance of accurately disclosing my background at the orientation.
20. I reviewed and signed my employment application at orientation after confirming again that it was accurate.
21. Other than a Swift recruiter and the man who conducted my road test, I did not speak with another Swift employee during the application process.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 3, 2012.

Signature: _____

Print Name: _____